

<p><b>UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK</b></p>	
<p>SHOLEM WEISNER,</p> <p style="text-align: center;">Plaintiff,</p> <p>-against-</p> <p>GOOGLE LLC and SHMUEL NEMANOV,</p> <p style="text-align: center;">Defendant and Involuntary Party.</p>	<p>Case No.: 20-cv-02862- AKH</p>

**DECLARATION OF JACOB GINSBURG**

Jacob Ginsburg, affirms under the penalties of perjury, pursuant to 28 U.S.C. §1746 as follows:

1. I am an attorney duly admitted to practice before this Court. I am a member of the law office of Jacob Ginsburg, Esq. PLLC the attorney for Plaintiff herein.
2. I make this this Affirmation in Reply to Google’s Opposition (ECF #50) to Plaintiff’s Cross-Motion and Opposition (ECF #s 36-39) to Nemanov’s Motion to Realign (ECF #s 28-30 “Nemanov’s Motion”).
3. I make this this Affirmation in further support of Plaintiff’s Cross-Motion (“Cross-Motion”):
  - a) for an Order confirming Involuntary Party Nemanov is not a Fed. R. Civ. Pro. Rule 19 Necessary Party, need not be named in the First Amended Complaint and may be dismissed/removed from the First Amended Complaint, or any amendment thereof, or alternatively,

b) that if arguendo Nemanov was a Rule 19(a) Necessary Party, he should be realigned if at all as an Involuntary Plaintiff.

4. Annexed hereto in support of are true and correct copies of the following documents:

Exhibit A	Plaintiff's State Court Affirmation
Exhibit B	State Court NYSCEF Docket

**WHEREFORE**, based upon the foregoing, and for the reasons stated in Plaintiff's Reply Memorandum of Law, and all other papers filed in support of Plaintiff's Cross-Motion and Opposition, Plaintiff respectfully requests that the Court overrule Google's Objection to Plaintiff's Cross-Motion and grant Plaintiff's Cross-Motion in its entirety; such other and further relief as to this Court is just and proper.

Dated: November 19, 2020  
Monsey, New York

/s/Jacob Ginsburg  
Jacob Ginsburg